

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN MOYA
YRAPURA; ROSA ELENA AMAYA; and
HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and A.J.
DWOSKIN & ASSOCIATES, INC.,

Defendants.

Case No: 1:16-cv-00563 (PTG/WBP)

**PLAINTIFFS' MOTION FOR PERMISSION TO INTRODUCE SELECT TRIAL
TESTIMONY VIA VIDEOCONFERENCE
OR, IN THE ALTERNATIVE, TO TAKE A *DE BENE ESSE* DEPOSITION**

Plaintiffs Rosy Giron de Reyes, Jose Dagoberto Reyes, Felix Alexis Bolaños, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”), by counsel, move for permission for Mr. Brady Bustany to testify at trial via videoconference from a remote location, or in the alternative, for a video deposition to be taken of his testimony for submission at trial. A concise brief in support of this motion and a proposed order are attached hereto.

WHEREFORE, Plaintiffs ask the Court to grant this motion.

Dated: January 10, 2025

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of January 10, 2025, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/ Larisa D. Zehr

Larisa D. Zehr, VSB #96032